

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

NICOLE HARRIS,)	
)	
Plaintiff,)	
v.)	No. 14-cv-4391
)	
CITY OF CHICAGO, Chicago Police Officers)	Judge John W. Darrah
ROBERT BARTIK, DEMOSTHENES)	
BALODIMAS, ROBERT CORDARO,)	Magistrate Judge Susan E. Cox
JOHN J. DAY, JAMES M. KELLY, MICHAEL)	
LANDANDO, ANTHONY NORADIN, and)	
RANDALL WO, Assistant Cook County State's)	
Attorneys ANDREA GROGAN and LAWRENCE)	
O'REILLY, and the COUNTY OF COOK,)	
)	
Defendants.)	

MOTION TO RE-OPEN REFERRAL FOR DISCOVERY SUPERVISION

Plaintiff, Nicole Harris, by and through her attorneys, respectfully requests that this Honorable Court re-open the referral to the Magistrate Judge so that Ms. Harris may file a motion on certain discrete issues that relate to discovery responses served on the date discovery closed (April 15), and that relate to prior hearings before the Magistrate Judge, which have been the subject of extensive meet and confer conversations as recently as the day before the referral was administratively terminated last week. In support of her Motion, Ms. Harris states as follows:

1. The City of Chicago served several responses and supplemental responses to Ms. Harris's discovery requests on the date that discovery closed, April 15, 2016. The City also objected and declined to answer certain requests that night.

2. Within a week, Ms. Harris initiated meet and confer conversations that were ongoing as of last week.

3. On May 11, however, the referral to the Magistrate Judge for discovery supervision was administratively terminated. The next morning, the City advised that it would no longer engage in the discussion, stating that it was too late to address discovery disputes.

4. Neither the administrative termination of the referral nor the close of fact discovery should preclude Ms. Harris from addressing deficiencies in the City's responses that were promptly raised and extensively discussed among counsel for the parties, but that nevertheless remain unresolved. This is especially so given that the City provided its most recent discovery responses within an hour of the close of fact discovery.

5. The City's latest responses relate to issues that have been discussed at length in hearings before the Magistrate Judge. Out of respect for this Court's time therefore, Ms. Harris intended to request at today's status before the District Judge that the referral be re-opened, but the status was reset to June 14. [Dkt 200.] Given Ms. Harris's preparation for the August 26 trial in this matter, Ms. Harris would like to resolve these few remaining issues while the parties await the next status date before this Court.

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WHEREFORE, for all of the aforementioned reasons, Ms. Harris respectfully requests that this Honorable Court re-open the referral to the Magistrate Judge for discovery supervision for the limited purpose of bringing her single motion, and order any other relief that is just and equitable under the circumstances.

Dated: May 18, 2016

Respectfully submitted,

/s/Margot Klein

One of Nicole Harris' Attorneys

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